

UNITED STATES DISTRICT COURT

JUN 13 2019

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America)

v.)

Ramon Mendez, Jr.)

DOB: 1992, USC)

Case No. M-19-1381-M)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept. 7, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841, 846

Conspiracy to Possess with Intent to Distribute More than 500
grams of Cocaine

This criminal complaint is based on these facts:

See Attachment A

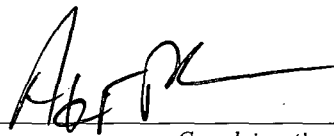
☒ Continued on the attached sheet.

Approved by

Sworn to before me and signed in my presence.

Date:

6/13/19

City and state: McAllen, Texas

Complainant's signature

Adam F. Palmer, FBI Task Force Officer

Printed name and title

Judge's signature

US Magistrate Judge J. Scott Hacker

Printed name and title

Attachment A

I, Adam Palmer, being first duly sworn, state as follows:

1. I, Adam Palmer, am a Task Force Officer with the Federal Bureau of Investigation (FBI) in McAllen, Texas, and have been so employed since February, 2016. I am currently assigned to the Rio Grande Valley Safe Streets Task Force in McAllen, Texas. This affidavit is based on information learned through the course of an investigation into an organization committing robberies for the purpose of stealing controlled substances for further distribution.

2. As a Federal Task Force Officer, I am authorized to investigate violations of federal laws of the United States, including violations of Title 21, United States Code, Sections 841 and 846.

3. On May 11, 2019, a search warrant was executed at an address in Edcouch, Texas. Pursuant to the search warrant, evidentiary items were seized, including a Samsung Galaxy J3 (Hereinafter "The Device") which was seized from within a mobile home that was on the property and where Jimmy Lee Tamez is believed to reside.

4. A subsequent search warrant was obtained to search the Device. The information contained with the device was forensically extracted pursuant to the search warrant in order to review it.

5. During a search of the device, Agents located various audio messages that were sent to the user of the Device. Specifically, Agents located a series of audio messages from an individual ("the Individual") from September 7, 2018 through September 8, 2018 discussing the sale of two items to an individual coming from Tennessee beginning at approximately 1:47 p.m. Agents then found a multimedia message from the user of the Device to the Individual of a picture of a block of a white powdery substance pressed with a design containing the letter "K" at approximately 2:48 p.m. on September 7, 2018. At approximately 4:11 p.m. on September 7, 2018, the Individual responded to the user of the Device in an audio recorded message requesting a different picture of the other side of the block of the white powdery substance without the stamped K to send to the buyers of the product so that the buyers would not suspect or believe the product to be "caliente," which Agents know to be a slang Spanish term for an item being stolen property. Later multimedia messages from the Individual contain pictures of large quantities of banded currency consistent with amounts needed to purchase kilogram quantities of cocaine. In subsequent audio recordings from the Individual to the user of the Device, the Individual that the multimedia message represents the money that others were to use to make the purchase.

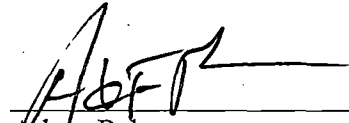
6. Based on information provided by various sources as well as law enforcement reporting, Jimmy Lee Tamez is believed to be involved in multiple home invasions for the purpose of stealing controlled substances.

7. During a review of the information extracted from the Device, Agents also located a video containing a time stamp creation date of September 7, 2018 at approximately 5:28 p.m. This video shows a male subject (later identified as Ramon MENDEZ, Jr.), with sleeve tattoos,

seated at a table opening a package by cutting black wrapping materials off of a block of a white substance. There was a design stamped in the white substance which included the letter "K". There were also two other identical wrappings on the table near the block consistent with two additional blocks of white powdery substance. In the audio of the video, another male subject is talking to MENDEZ discussing a robbery, the quality of the substance, and plans to take pictures of the substance. The background seen within the video is consistent with the trailer in which Jimmy Lee Tamez resides and the premises in which the search warrant was executed.

8. The blocks of white powdery substance pressed with the letter K observed by agents is consistent with and believed to be kilograms of cocaine. Furthermore, the discussions and multimedia messages between the user of the device and others as previously mentioned indicate the conspiracy between Mendez and others to possess with the intent to distribute the cocaine to others by selling the kilograms.

9. Agents have identified the subject seen in the video referenced in paragraph 7 as Ramon Mendez, Jr. based on interviews and prior jailing photos.


Adam Palmer
Task Force Officer
Federal Bureau of Investigation

Sworn to and subscribed before me this 13th day of June, 2019.


Hon. J. Scott Hacker
United States Magistrate Judge